FINDING OF NO SIGNIFICANT IMPACT
AND
DECISION RECORD

Grand Prix Motorcycle Race at Virginia City
EA-NV-030-03-019
File Code: Special Recreation Permit NV-03W-03002

Decision
It is my decision to authorize a Special Recreation Permit to the Virginia City Motorcycle Club to conduct the annual Grand Prix Motorcycle Race at Virginia City across public lands as described in the proposed action of EA NV-030- 03-019.

The decision is contingent on meeting all stipulations and monitoring requirements listed below:

1. There shall be no motorcycle racing, Check Point or designated spectator area on a historic mill site tailing pile as a part of the event. The racecourse must follow established roads and trails located on stable soils.

2. There shall be no motorcycle riding or racing within the boundaries of the historic cemeteries.

3. One race event per year for the next five years may be conducted by an authorized permittee.

4. Each racecourse shall follow routes approved by the BLM, private landowners and the County.

5. Each race shall be of the same or similar character as the event analyzed.

6. Each race shall be conducted with emphasis on Minimum Impact to and rehabilitation of natural and cultural public and private resources.

7. Each race shall be conducted according to the organized racing association rules and regulations, County regulations and Ordinances unless otherwise waived by the County, and BLM Special Recreation Permit Stipulations for OHV/Motorcycle Race Events which also address post-event clean-up, route maintenance and use fee payments.

8. Each race shall be conducted in an organized manner assuring consideration, preservation and protection of public safety, natural, cultural and historic resources.

9. Should a racecourse segment require a change in location (for resource protection or public safety), the proponent shall co-ordinate that re-location and receive approval necessary from the BLM and/or private landowners prior to implementation of the re-location.

10. The BLM or an authorized representative shall monitor each event in order to observe event organization and safety, to document use, and to evaluate resource effects.

RATIONALE FOR THE DECISION:
The decision to allow the proposed action is consistent with the Consolidated Resource Management Plan and would not result in any undue or unnecessary environmental degradation.

The applicant has demonstrated a need to utilize the public lands for the proposed recreation special event. The public has demonstrated a continued demand for motorized racing events where the mileage distance provided by public lands are required.

The commercial/competitive event provides recreational opportunities for the participants, spectators and local tourism entities.

The event area sustains moderate outdoor recreation use and has been evaluated to be able to support organized and managed events of this type, size and nature. All activities will occur on previously disturbed areas and established roads and trails.

The event area will be monitored for Cumulative or long lasting impacts that may trigger further evaluation. Limits of Acceptable Change criteria may be developed if impacts are measurable.

FINDING OF NO SIGNIFICANT IMPACT: Based on the analysis of potential environmental impacts contained in the attached environmental assessment NV-030-03-019. I have determined that impacts are not expected to be significant and an environmental impact statement is not required.

Charles P. Pope 4/24/03

Signature of Authorized Officer Date

Charles P. Pope
Assistant Manager, Non-Renewable Resources
Carson City Field Office

Virginia City Grand Prix Motorcycle Race

Virginia City Motorcycle Club

EA-NV-030-03-019

SRP – NV-03W-03002; beginning April 26 & 27, 2003

I. INTRODUCTION/PURPOSE AND NEED

INTRODUCTION

The Virginia City Motorcycle Club has applied for a Special Recreation Permit (SRP). The purpose of the proposed action is to continue to conduct the Grand Prix at Virginia City, a competitive/commercial motorcycle race across public and private lands east of Virginia City, Nevada. This year's event is proposed for April 26 and 27, 2003. It is anticipated that the event is likely to re-occur annually over the next five years minimum.

History:

For thirty years, the event had been conducted on Mother's Day weekend. Western States Racing Association conducted all of these events from 1970 through year 2000. No race was conducted in the year 2001. The economic impact to the Virginia City was apparent, so a partnership was developed between the Virginia City Convention and Tourism Board and the newly formed Virginia City Motorcycle Club in an effort to bring the race back to town, under local management, and recapture the economic value for the community. The Grand Prix at Virginia City (the 31st such race) was successfully conducted in April 2002.

Previous races had been known to attract from 350 – 900 racers over a two-day weekend. The 2002 race attracted more than 400 competitors. Having the race date in late April or early May has become the traditional start-up of Virginia City's annual tourist season.

BLM field personnel have monitored the race each year to ensure that the racecourse follows an authorized route, to observe whether or not natural and historic resources are being affected by event participants or spectators, to evaluate whether or not the permittee is conducting the event according specified race rules and permit stipulations, and to ensure that public and participant safety is adequately provided for. To date, permittees have earned Acceptable permit performance ratings from the BLM. No intentional performance violations have been documented.

PURPOSE

The purpose of the proposed action is to continue to conduct the Grand Prix at Virginia City, a competitive/commercial motorcycle race across public and private lands east of Virginia City, Nevada. With continued approval, the event is likely to recur annually over the next five years.

NEED

Virginia City has a tourism-based economy, which depends on special events such as the Grand Prix Motorcycle Race to attract people to the town.

The proposed action contributes towards meeting the public's demand for competitive, motorized recreational use on public lands. As a competitive recreational use of public lands, title 43 of the Code of Federal Regulations (CFR) part 2932.11(a)(2) requires the issuance of a Special Recreation Permit.

A. Land Use Plan Conformance Statement:

Name of Plan: Carson City Field Office Consolidated Resource Management Plan

Date Approved: 2001

Page(s): RMP Level Decisions: Recreation - Section 8 Page 2:

Provide a wide variety of recreation opportunities on public land under the administration of Carson City Field Office.

Land Use Allocations: Section 8 Page 2:

"All public lands under CCFO jurisdiction are designated open to Off-Highway Vehicle (OHV) use unless they are specifically restricted or closed."

Administrative Actions: Section 8 Page 6, Item 4:

On public land designated open for off highway vehicles, there will generally be no restrictions on use. Organized competitive OHV events have been allowed in Mason Valley, Wilson Canyon, Hungry Valley OHV Area, Moon Rocks, Lemmon Valley MX Area, Dead Camel Mountains, Salt Wells Area, Wassuk Range, **Virginia City**, Pine Nut Mtns., the Frontier 500 Carson Rally, and Vegas to Reno OHV race corridors. Organized events will be handled on a case-by-case basis through the Special Recreation Permit review and Environmental review process'. Organized activity is generally restricted to existing roads and trails. Casual OHV use is generally unrestricted.

Conformance Summary:

The proposed action is in conformance with the Carson City Consolidated Resource Management Plan.

II. PROPOSED ACTION AND ALTERNATIVES

Proposed Action:

Applicant: Virginia City Motorcycle Club

Location: Storey County, Virginia City, Nevada. T16N R21E and T17N R21E

Map (s): Carson City Surface Management Map @ 1:100,000 scale
Virginia City and Flowery Peak Maps @ 1:24,000 scale

Mileage: Annual race loop mileage varies from 15 – 30 miles.

Standard Operating Procedures: Race Event Organization and BLM Permit Stipulations

Pre-agreed upon conditions that may meet mitigation requirements:

All racing occurs upon established roads and trails available for recreation and motorized uses. Race use occurs within the obvious pathway , which varies in width from less than 2 foot to more than 12 feet.

Authorized route locations have stabilized over the past 10 years. No new route is proposed.

The race begins and ends on private land within Virginia City. The proponent notifies all private landowners in the vicinity of the event and receives concurrence where necessary.

Private and public landowners affected by the race route are listed as additional insured

The race sponsor must receive approval from the Storey County Commissioners and County Sheriff in conjunction with private property owner concurrence prior to BLM permit authorization.

Proposed Action Description:
The proposed action is to conduct one motorcycle race each year utilizing varying combinations of approved routes, which have been used for motorcycle racing during the past thirty-two years.

The event usually occurs on a variation of routes within T16N R21E Sec2,3,4,5 and T17N R21E Sec20-23,25-29,32-36 located on the following maps: Virginia City and Flowery Peak 1:24,000 topographic maps. The public lands affected are within the Virginia City National Historic Landmark boundary. The lands are interspersed with patented mining claims and other private land holdings.

The Grand Prix is a multiple lap motorcycle event over a 15 – 30 mile course consisting of paved roads city streets, dirt roads, powerline right-of-ways, jeep trails, and single-track trails through dry washes and ravines. Total race mileage per daily event is 75 – 125 miles per rider. The race would be conducted according to District 36 and/or the Motorcycle Racing Association (MRANN) rulebooks. Per the MRANN rule book, the description of a Grand Prix follows: A Grand Prix race is run on a closed course* roughly fifteen (15) to twenty-five (25) miles long with variable types of terrain including paved roads, open desert, sand washes, and motocross course. The route may incorporate a combination of additional obstacles such as water crossings, buildings, wood, bridges, steep hills, trees, brush, rocks, sand and gravel. The race must be at least one hour running time for all finishers. Riders must receive the checkered flag and complete one (1) lap for every two (2) laps completed by the leader. The grand prix may be run as a heat race at the discretion of the club. The race will be cut off after the leader finishes. * A closed course is a course with definite markings on each side, i.e. banners, hay bales, tires or edges of the roads. Where definite marking do not exist, riders must remain within fifty (50) feet either side of the marked course. To minimize ground disturbance, the BLM permit Stipulations allow for the disturbed trail areas only from 1 foot to 12 feet wide, not fifty feet.

Local specifics: The Grand Prix at Virginia City has most commonly been conducted according to the following format: Novice race on Saturday 2 ½ hours; Pro/Experts on Sunday for 3 ½ hours. These races begin once each day at 9 a.m. Racers are lined up 10 riders across all the way down Main Street. There may be up to 400 bikes each day. Riders are started 10 at a time every fifteen seconds. Riders may complete from 2 to 6 laps of the course during the allotted time period. The closed course at Virginia City is the existing road or trail within 2' – 12' of the pink flagging which is usually located along the riders' right-hand side of the course. Corners are bannered and flagged to keep riders on course. Check Points are scattered through out the course length to ensure competitors do not shortcut the race route.

Pee Wee and Mini Races are staged on Saturday only. A small motocross course is built on approximately 1 acre of the parking area near the Old Virginia City Depot. This area contains the Pee Wee race and serves as the slow-down for the Start/Finish/Pit for the main races. The Pit is adjacent to

this area. It also is the main spectator location. The Pee Wee race occurs prior to the Start of Saturday's main event; the Mini Race occurs after the Saturday main event. The Mini riders compete over a shortened version of the main course. They ride for approximately one hour.

Upon conclusion of the race, the course would be ridden by representatives of the permitted Club to pick up all directional signs, flagging and any debris left by the participants and/or spectators. Excessive ruts and high berms would be reduced – loose soil would be replaced into the tread path.

Rider entrant fees vary from $40 - $50 Amateur; $80 - $85 for Pro entries. Cash payback to the Pro Class is 50% of the entry fee. Trophies and Sponsor prizes are also awarded.

A Temporary Closure would be in effect on public lands for public safety and to protect adjacent resources. Public camping, land and trail use would be restricted for the weekend of the event.

The event coordinator works with the local mining claimants to ensure the race route is on approved routes that avoid mine related digging and equipment. Hazards that cannot be moved are brightly flagged and bannered to reduce the risk of a rider collision or fall. Adits and airshafts near the course have been fenced. These areas are brightly flagged to avoid incidental collision.

Alternatives

A. No Action Alternative:

The only alternative to be considered further in this analysis is the No-Action Alternative. Selection of this alternative would deny the applicant authority to conduct the event across public land.

III. AFFECTED ENVIRONMENT

The affected environment for both the Proposed Action and Alternative A- No Action are the same.

SCOPING AND ISSUE IDENTIFICATION

Scoping:

For every proposed event since 1988, public letters have been mailed annually at least four months prior to the event date. Interest and response has been few.

The 2003 public letter was mailed to approximately eighty members of the interested public. The mailing list included Virginia City residents, commercial businesses, the local newspaper, natural resource management agency representatives, historic preservation representatives, and Native American representatives. This letter advised the public of the Special Recreation Permit application and requested public comment regarding the event. The letter was mailed January 28 with a thirty-day comment window.

The information request was E:mailed to various resource specialists in the BLM Field Office. A copy of the public letter was also routed through the Divisions.

To date (March 3, 2003) four comments have been received: three are letters supporting the event; one was a phone call regarding concerns about specific road closure, but was supportive of the event to help the community.

Nevada Division of Environmental Protection, Air Pollution Control, requested to be advised of all OHV events. They want to begin informal observations in order to gather information about fugitive dust generation associated with motorized recreation events.

The 2003 proposed action has been run through the BLM, Carson City Field Office Nobility Program.

The following Environmental Assessment has been built off of a combination of Nobility, data from previous environmental assessments and an incorporation of more recent environmental assessment information categories.

PROPOSED ACTION / AFFECTED ENVIRONMENT:

General Setting & Land Use

Virginia City is in Storey County, Nevada located about 6 miles north of Carson City. It lies between two mountain ranges - the Virginia Range to the west and the Flowery Range to the east. The City is at 6300' elevation. Mt. Davidson, due west of town is 7864' high. Flowery Peak to the east is slightly lower at 6581'. The terrain is generally steep and at an average elevation of 6500 ft. Public lands in this immediate area are utilized primarily for mining exploration, historic attraction and event tourism, casual and organized recreation, wildlife habitat, and grazing.

Virginia City is one of the nation's largest historic districts and currently has a population of 800 – 1000 residents (700 in year 1992). Storey County had 2,820 residents in 1992 and 3,992 residents in year 2000.

During the historic time period for which the Comstock is noted, more than 30,000 people lived within the vicinity. At that time, mining and milling ore for gold and silver was the main occupation.

The modern economic base stems primarily from tourism, mining exploration, and residential inhabitation for people who work in Carson City, Reno and Dayton.

Critical Elements of the Human Environment:
Eighteen elements of the human environment are specifically required by statute, regulation, executive order, or State guidelines that must be considered in the proposed action and alternatives of all EA's. Items (*) are to be carried forward for analysis. These are:

1. Air Quality: *
2. ACEC:
3. Cultural Resources *
4. Environmental Justice:
5. Farm Lands (prime or unique):
6. Flood Plains:
7. Hazardous Materials *
8. Invasive, non-native species (weeds) *
9. Migratory Birds:
10. Native American Religious Concerns:
11. Paleontology:
12. Threatened or Endangered Animal Species *
13. Threatened or Endangered Plant Species *
14. Water Quality (surface/ground):
15. Wetlands/Riparian Areas *
16. Wild or Scenic Rivers:
17. Wilderness:
18. Wild Horses and Burros

The following critical elements of the human environment are not present or would not be affected by the proposed action or alternatives of this EA:
ACEC
Environmental Justice
Farm Lands (prime or unique
Flood Plains
Migratory Birds
Native American Religious Concerns:
Paleontology
Water Quality:
Wild or Scenic Rivers: Not present.
Wilderness: Not present.
Wild Horses and Burros

Other Resources and Environmental Elements that have been brought forward for analysis:

1) Human Health and Safety
2) Lands and Realty
3) Range
4) Minerals/Mining
5) Recreation
6) Socio-Economics
7) Soils
8) Vegetation
9) Visual Resources
10) Wildlife.

Critical Elements and Resources present and brought forward for evaluation :

III. a. Air Quality*:
The United States Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS). The EPA set these standards to protect human health and welfare.

Air pollution, for the purpose of this proposed action, comes from "mobile sources", such as motorcycles (dirt bikes); and "natural sources", such as windblown dust. The primary pollutant would be particulate matter (aerodynamic size </= to 10 microns, </= 2.5 micron in the forms of fugitive dust and engine exhaust (2 and 4-cycle engines).

The Virginia City area has paved roads and street within one mile of the commercial development of town. The rest of the roads around the area are a combination of aggregate surface and unsurfaced dirt. These roads are maintained by road grader equipment and by consistent vehicle passage.

III. b. Cultural Resources *:
The proposed motorcycle race occurs within the boundaries of both the state-designated Comstock Historic District and the federal-designated Virginia City National Historic Landmark (NHL). The surrounding area is generally referred to as the Comstock. The Virginia City NHL encompasses nearly 16,000 acres of public and private lands, most of which is administered by the BLM. Motorcycle racing occurs within approximately 7000 acres of the Landmark, mostly east of Virginia City.

The Comstock was designated as a NHL in recognition of its contribution to industrialized mining and the country's development during the Civil War. Historic resources are linked primarily to mining activity, which began in 1852. Discovery of the Comstock Lode in 1859 initiated a population boom centered on discoveries of gold and silver. The area from Silver City to Long Valley supported nearly 30,000 people during the heydays between 1860 and 1922. The price of silver fell after World War I, and miner success decreased. Exploration slowed after World War II while the volumes of retrievable minerals also slowly diminished. East of Virginia City within the event area, minimal mining and ore processing continued through the 1970's.

Routes utilized by the racecourse are a combination of modern and historic linear features, including constructed and unimproved roads, pack and livestock trails, water flume routes, and motorcycle trails. Many of the historic linear features are used today for modern travel corridors.

One of the most notable historic linear feature utilized by past motorcycle races is the Sutro Tunnel Road. This road is approximately 3 miles long with a width ranging from 10 to 12 feet. Almost 2 1/2 miles are on public land. A primary feature of the Sutro Road is the extensive hand-stacked boulder retaining walls. Other features found along the Sutro Road included building foundations and walls and remnants of the airshaft complexes associated with the Sutro Tunnel. Artifacts scattered along the road include glass, ceramic, tinned canisters, square nails, bricks, and scores of unidentifiable metal fragments. The route had been used repeatedly during the first twenty years of the event history. It was last used for a race under BLM permit in 1994.

Historic mill sites and numerous exploration pits are a dominant part of the Landmark landscape. Approximately 27 mill sites (nine on public lands) are near the racecourse as are piles of waste rock. These sites are quite distinct evinced from the stone and metal building remnants and from differences in the soil coloration and texture.

Reference: *Conceptual Site Model (Task1.5) Carson River Mercury Site Remedial Investigation/Feasibility Study September 17, 1991.*

Native American utilization of the Virginia Range is known, from temporary encampments, lithic scatters, to rock art. The Washoe Tribe primarily used the area for hunting and foraging. During the historic times, members of the Paiute tribe were the dominant Indian group in the Comstock. Due to the nature of industrialized mining, numerous prehistoric sites would have been destroyed. Likewise, the motorcycle race takes place on existing roads and trails. It would have been unlikely that prehistoric resources to have been present in the project area.

*Reference: Northern Paiutes on the Comstock: Archaeology and Ethnohistory of an American Indian Population in Virginia City by Eugene Mitsuru Hattori, 1975.

III.c.Hazardous Materials *

In August 1990, the United Sates Environmental Protection Agency (EPA) listed the Carson River Mercury Site (CRMS) on the EPA's National Priorities List. The CRMS is defined by EPA as: (1) sediments in an approximately 100-mile stretch of the Carson River in Lyon and Churchill Counties, beginning between Carson City and Dayton and extending downstream through Lahonton Reservoir top Stillwater Wildlife Refuge; and (2) tailing piles and sediments in Gold Canyon., Sixmile Canyon, and Sevenmile Canyon. The principal contaminant is mercury from mining activities during the Comstock era (1859 – 1900). The study was initiated by finding of elevated mercury as a result of field sampling conducted by the USGS in 1971. *Reference: EPA information brochure dated August 1991.

The brochure continues to explain the Superfund Process and the reasons for concern. For the purposes of this EA, brief descriptions of applicable topics are included:

> There are three types of mercury: elemental, inorganic and organic.
>
> Elemental mercury, or "quicksilver" was added to the amalgamation process to release gold and silver from the finely crushed ore during the historic milling process conducted from 1861 – 1900. It can be absorbed through inhalation.
>
> Inorganic is a mercury salt mixed in the soil. It can be absorbed by ingestion or inhalation.

Organic mercury is a product of inorganic mercury, which is transformed in an aquatic environment such as rivers or lakes. Once it is in a river for example, it is easily taken up by fish, then by the animals and humans who then eat them.

The EPA stated that the most significant human health concerns at the CRMS site were:

Over-exposure to organic mercury due to consumption of fish and waterfowl containing unacceptable levels of organic mercury in muscle tissue;

over-exposure to inorganic mercury due to ingesting soil and / or sediments containing un-acceptable levels of inorganic mercury.

Relevant to motorized recreational use: In 1990 the EPA had several piles of mercury-contaminated mine tailings removed and treated. The piles were located four miles east of Dayton and west of Highway 50. The principal health concern was that the piles were attracting off-road vehicle users who potentially exposed themselves to unacceptable levels of mercury-contaminated dust.

In July of 1992, the US Dept of Health and Human Services published a Preliminary Health Assessment for the Carson River Mercury Site. In the conclusions of the document, the area of emphasis and concern was the Carson River and residential Dayton town site. Page 53 of that report has the following statements:

"For adults who occasionally work and play in these contaminated areas, health effects are unlikely to occur. However, for children less than six years of age, who play every day along these areas and who ingest 200 mg of sediment soil each day, their mercury exposure could damage the kidney and central nervous system. Because they ingest smaller amount s of soil, older children and especially adults are at less risk of developing adverse health effects."

Following extensive investigation, field studies, collection and analysis of hundreds of samples of surface and sub-surface soils, sediments, groundwater, vegetation, garden crops, and indoor air, the resulting report *Revised Draft, Human Health Assessment and Remedial Investigation Report (HHRA)* was produced in 1994. As a part of that assessment, the EPA established a site-specific cleanup level of 80 ppm (parts per million) mercury for contaminated soils in residential areas. Four areas in Dayton and Silver City were found to exceed the limitation. *Reference: EPA Update as of May 15, 2002.

Conclusions from the *1994 HHRA* included the following (not all findings are listed):

"Although the soil ingestion pathway is important for all of the contaminants of potential concern (COPCs), the significance of this pathway varies according to the land use (i.e., residential, occupational and recreational) and according to the concentration of the COPC in the surface soil. For residential use the mercury and arsenic were detected in surface soil at levels which translate into HI.>1 for a young child (<6 years of age). For recreational or open land use areas (i.e. Brunswick, Sixmile Canyon, Gold Canyon, Lahontan Reservoir Indian Lakes, and Washoe Lake beach areas), none of the COPCs were found to occur in surface soil at levels which are considered significant for the exposure pathway."

"Inhalation of airborne contaminants does not appear to be an exposure pathway of concern for any of the COPCs irrespective of the land use scenarios.

6.2.3 Characterizes mercury levels in soils at and around mill sites: for this sampling 25ppm of mercury was the minimum threshold for surface soil test reactions. Maps and charts were created and analyzed. Several of the tailing piles produced mercury readings > 80 ppm.

A public meeting was held in 1995 to evaluate the findings and proposed mitigation. After that meeting, the EPA adopted its final cleanup plan and *Record of Decision*. No new findings were presented and the Record of Decision re-iterated the conclusions of the *1994 Human Health Risk Assessment Report.*

Between 1995 and 1999, EPA's contractors continued cleanup work in Dayton and Silver City (cleanup work is detailed in the *Remedial Action Report, CRMS, September 2000*). The emphasis on continued study is focused on the Carson River, Lahontan Reservoir and Carson River Basin as it affects fish, waterfowl and wildlife.

As a result of the findings and continuing studies, Nevada Division of Health has published a Health Advisory in the Nevada Fishing Regulations. The statement "advises consumers to refrain from eating fish caught from the Carson River in the vicinity of Dayton downstream to, and including Lahontan Reservoir, and all waters in the Lahontan Valley".

Included in the EPA reports are recommendations that the public refrain from riding ATVs and dirt bikes on tailing pile mounds. The advisory recommends recreationists avoid disturbing unvegetated soils on the potentially contaminated tailing piles to reduce exposure to self-generated fugitive dust.

*Note: A discussion with minerals specialists has provided information that there is a difference between tailings and waste rock. Tailings are the result of finely processed ore that may have had mercury and other chemical components added during processing, whereas waste rock is mined rock of insufficient value to warrant treatment and is therefore removed ahead of the milling process. It is untreated rock.

From conclusions derived from the EPA Record of Decision, it may be surmised that health risks to youth older than 6 years, and to adults from dust inhalation created from recreational land uses are minimal when soil disturbance and personal exposure is temporary or infrequent.

III.d.Invasive and non-native species (weeds) (+)

There is a record of Scotch thistle (*Onopordum acanthium*), along portions of the event area as well as in the general area. Perennial pepperweed or Tall whitetop (*Lepidium latifolium*) is preevalent along the Six Mile Canyon roadway drainage channels. The plant has also been observed throughout the Landmark wherever moisture and receptive soils appear. Both plants are considered weeds.

Storey County, in co-operation with the BLM is engaged in an active weed abatement program.

III.e. Threatened or Endangered Animal Species *

The loggerhead shrike (*Lanius ludovicianus*) and mountain quail (Oreortyx pictus), U.S. Fish and Wildlife Service Candidate, Category 2 bird species, may occur in the area. The birds pair up and nest during early spring (March, April) with hatches occurring in May.

Sage grouse (*Centrocercus urophasianus)* is a BLM sensitive species. Grouse have not been observed in the Virginia City area and particularly not in the race event area east of Virginia City. Some areas of sagebrush do exist, but historically Pinyon trees dominated the area.

III. f. Threatened or Endangered Plants Species

Erioginum lobii robustum (buckwheat), a Candidate Category 2 plant species, occurs throughout the Landmark and occasionally near the proposed routes where there are mine tailing piles or the Altered Andesite soils and extensively on the undisturbed mining related waste rock piles. .

III.g. Wetlands/Riparian Areas *

There are no wetlands within the event area.

There are a few intermittent springs and streams scattered throughout the event area. The springs are more than 100' from the event routes and are located on hillsides. Intermittent streams are located at the western base of Emma Peak (Emma Ravine) and south of Virginia City in what is called the Yellow Jacket Ravine.

Sixmile Canyon could also be considered somewhat riparian. Water runs alongside the main road creating an environment that supports willow and cottonwood along with the weed species, tall white top. Birds and deer have been observed along the canyon. The water is treated tertiary water released from the sewer treatment plants.

None of the streams or water sources in the event area support fish , provide swimming opportunities or contribute to human drinking water systems.

Resources present and brought forward for further analysis:

III.h. Human Health and Safety

The event area is within the Comstock Mining District, an area, most active during the exploitation and gold rush of the Comstock Lode from 1860 – 1880. Abandoned mines, mill sites, shafts and mine workings are numerous throughout the Landmark.

Some of the historic and modern (to 1970's) mining related activity is directly adjacent to the race route. Open holes and hoisting hazards are fenced and signed. The historic mill sites are generally unfenced and are a part of the overall landscape. All are accessible by dirt roads and none are excluded from the general public. Most mill sites are located on private lands.

Motorized vehicle events utilizing roads and trails on BLM managed public lands may create the risk of collision between event participants, other public land users or wandering livestock Small groups of wild horses roam in the area. These horses are under the limited protection of the State of Nevada and local interest groups such as "Let 'em Run, Inc.".

There is a remote risk of wildland fire from an errant motorcycle exhaust or other human cause if drought conditions prevail and vegetation is extremely dry.

III.i. Lands and Realty

Surface Estate - Public and Private: Of the lands within the event area east of Virginia City, approximately 4,000 acres are BLM managed, public lands and 3,000 acres are private lands. Most of the private lands are a mixture of residential and commercial uses in town, with undeveloped parcels and patented mining claims outside of town.

Mineral Estate: Public

Major Roads: The Proposed Action occurs on or crosses existing roads. Major roads affected include: Main Street, Six-Mile Canyon Road, Highway 342 and Highway 341, the Truck Route.

Minor Roads: The Proposed Action occurs on and crosses several existing dirt roads, and Jeep trails near Virginia City and Gold Hill.

Right-of-Way - Power Line: Several overhead utility line alignments are crossed under by the various racecourses.

Urban areas: The race event occurs within and through the Virginia City urban area.

III.j. Range

The Flowery and Virginia Ranges are within the Gold Hill and Carson Plains grazing allotments. Borda Land and Sheep Co. grazes sheep from April through May annually.

There is no known range project site near the event area

III.k. Minerals/Mining

The event area is within the Comstock and Flowery Mining Districts. There are currently no active Mining Plans of Operations within the event area. The largest open pit mining had been at the Lady Bryan Mine, off of Six Mile Canyon Road. That mine has been closed down and has been rehabilitated over the past five years.

The race crosses several Patented Mining Claims. The event coordinator contacts these claimants for permission to cross the land. Claimants include: Hugh Roy Marshall, Julius Bunkowski and Pete Leonard, Sutro Tunnel Company.

III.l. Recreation

The areas roads and trails are frequently utilized for other commercial, recreational activities and permitted events such as: guided big game and upland bird hunting, competitive horse endurance rides, Off Highway Vehicle rallys, mountain bike events and various horseback, wagon, ATV and Jeep tours conducted along the roads and trails. These events and activities occur under BLM permit and County approval. Annual special events begin in May and the last event usually occurs in September. Approximately 100 – 250 participants enter each event. Family and friends accompanying the competitors spend time shopping and exploring historic Virginia City.

Casual, public recreational use of the area for which permits are not required include: mountain biking (nationally recognized IMBA Epic Ride Route), hiking, horseback riding, ATV riding, big game and

upland bird hunting, and 4-wheel drive exploration of the historic sites, geologic exploration, wild life viewing, and wild horse viewing.

III.m Socio-Economics

Virginia City depends primarily on tourism economics. Current estimates from Virginia City Visitor and Tourism Authority state that approximately 1.4 million visitors travel to Virginia City annually. They are drawn by the old west mystique, interest in western American history, mining and the gold rush. Traditional small-town events such as holiday parades and unusual events such as the camel races are popular family and tourist attractions.

People from all over the world visit the Comstock area to experience the historic, rugged and scenic landscape setting, and to enjoy the opportunity to explore that landscape through various recreational pursuits. Outdoor activities usually involve 4 X 4 driving and ATV riding, mountain biking, and hiking the primitive back roads and trails in search of adventure, solitude, wildlife observation, geologic exploration and photographic opportunities.

The townspeople are actively re-conditioning noteworthy buildings and mining features in order to draw visitors back to the "old west" atmosphere. A popular visitor attraction during the summer is a ride on the restored Virginia & Truckee Railroad between Virginia City and the Gold Hill Depot. The tourist season begins in April with the Grand Prix Motorcycle race, peaks in July and winds up in December. Frequent special events include parades for every holiday, cultural and novelty activities including stage performances at Piper's Opera House, cemetery tours, Camel Races and street motorcycle gatherings.

III n. Soils / Dirt Roads and Trails

The proposed motorcycle race event route occurs within the Flowery Range. Topography affected by the route is moderate to steep slopes at elevations between 5000'- 6700'. Most of the event route takes place between 5300' - 5600'.

Soil types identified along the proposed route area include: 080 - Wedekind-Xman-Indiano association, 135 - Oppio-Nosrac, Tristan-Duco-Zephan, Devada Rock outcrop complex, and Devada-Olac-Old Camp association.

These soils are rated poor - fair for rangeland re-vegetation, have rapid water runoff characteristics, and have bedrock within 20" - 40" below the surface. Most are erosive, stony or sandy loams with moderate to slow water permeability. Wind erosion potential is slight.
The road and trail disturbed area represented by each annual event within the Landmark totals approximately 14.5 acres. Total mileage and acreage of *available* routes within the east side event area are also listed.

A chart of the route elements follows on the next page:

Road Type	Miles	Avg. Width	Potential Surface Disturbace	
Type I Paved	2 miles	24 ft	0 acres/mile)	0 acres
Available	*> 5 miles*		*0 acres per mile*	*0 acres*
Type II Graded	1 mile	16 ft	1 acres / mile	1 acres
Available	*3 miles*		*1 acres /mile*	*3 acres*
Type III Mining related/bladed	10 miles	10 ft	½ acres/mile	5 acres
Available	*20 miles*		*½ acres/mile*	*10 acres*
Type IV Two-track & wash	1 mile	8 ft	½ acres/mile	1 acre
Available	*2 miles*		*½ acres/mile*	*1 acre*
Type V Single track & wash	4 miles	2 ft	¼ acres/mile	1 acre
Available	*5 miles*		*¼ acres/mile*	*<1 acre*
Type VI Pit / MX/parking/camping				5 acres
Available				*5 acres*
Totals	**18 miles**			**13 acres**
Available	***35 miles***			***20 acres***

With the event area including nearly 7000 total acres, the above acres potentially disturbs less than 1% of the land area during each event.

Of the average annual route mileage, approximately 60% crosses BLM and 40% crosses private lands.

This represents the average mixture of event routes used during motorcycle race events over the past 10 years. No new route is proposed. All routes have been used for motorcycle, mountain bike and horse endurance race events in the past. All but the Type IV and V routes have been used for OHV racing of 4 X 4 vehicles (two-axle). These races were discontinued in the mid 1990's. All but the Type V routes have been used for non-competitive OHV rallys within the past ten years.

III.o. Vegetation

Vegetation types represented are woodland (pinyon/juniper) and rangeland (sagebrush/grasses). Limited riparian vegetation (willow/water grasses & plants) occurs in seasonal drainages.

Plants along the route include sagebrush (Wyoming big sage, low sage and bud sage), Antelope bitterbrush, Thurber needlegrass, bottle brush, squirrel tail, green ephedra, Utah juniper and pinyon trees. Some willows occur in the seasonal washes. Concentrations of wild onion have been observed along the route where the soil is sandy and somewhat moist during March & April.

Pinyon and juniper trees occupy a large portion of the landscape. These stands are over 100 years old and represent a regeneration of the woodlands that were cut down to support the Comstock mining operations in the 1860's.

III. p. Visual Resources Management

As a result of the 1986 RMP Record of Decision, the Visual Resource Management ratings for the area are Class III (changes in the landscape due to management may be evident, but should be subordinate to the basic landscape) and Class IV (changes in the landscape due to management may attract attention and dominate the landscape if those changes repeat the basic elements of the landscape).

The Class III rating is attributed to lands adjacent to Virginia City itself. Class IV describes the more distant hillsides. Historic and recent mining disturbance contributes greatly to this areas character and scenic interest.

The natural landscape of the project area consists of steep slopes of the Virginia Range dissected by westerly trending drainages. Landscape colors are predominately shades of gray and brown (soils) and yellow and green to gray-green (vegetation).

Other improvements in the general vicinity of the event area consist of fence lines, unimproved two-track roads, overhead utility lines, buried communication cables., residences and commercial developments.

III.q. Wildlife

The Virginia Range and surrounding foothills offer year-round mule deer habitat. Herd populations are small. The area is also notably utilized by mountain lion. The area is included within Area 195 of the Nevada state big game hunting management unit. Approximately 60 deer tags are allotted seasonally. The deer-hunting season is the beginning of November through the beginning of December. The lion-hunting season is year-around and is dependent upon whether the "take quota" has been reached in the area. NDOW administers hunting activities.

Deer, coyotes and other animals roam freely among public and private land areas. They are accustomed to the sights and sounds of man, but still do not exhibit tame characteristics.

Chukar, a non-native upland game bird, may occupy the rocky terrain east of the event area. Mountain bluebird, robin, owls, hawks, eagles and other bird species occupy the area at various seasons of the year. Common migratory birds that may use this area as habitat include various species of song birds, blackbirds, hawks, finches, doves, juncos and meadow larks.

Small mammals including upland game such as rabbits, various furbearers such as bobcat, and various rodents and reptiles indigenous to the Great Basin occur within the Landmark.

Alternatives:

The description of the affected environment for the **No Action alternative** would be the same as that for the proposed action.

IV. ENVIRONMENTAL CONSEQUENCES

Proposed Action - Environmental Impacts

IV.a. Air Quality:

There are no restrictions, other than the maintenance of ambient air quality, in the Virginia City area. The towns' proximity at an upper elevation and west side aspect contribute to the area's clear air from cooler, moister air temperatures and afternoon, down slope winds and breezes from the west and south.

The early spring annual race date may contribute to the opportunity for optimal soil conditions resulting in low levels of dust generation (more soil moisture, higher relative humidity, cooler temperatures, and wind).

There is potential for fugitive dust occurrence from the passage of racing motorcycles over dirt roads and trails. This potential would increase depending on the weather before and during the event: warm, dry weather could decrease soil moisture and increase fugitive dust; cool temperatures, residual soil moisture from winter snow melt or spring rainfall could increase soil moisture and decrease fugitive dust.

Approximately 8 acres of existing roads and trail could have some level of surface disturbance for the duration of each race. Each race is approximately 1hour (mini-bikes) – 3 hours (big bikes) long each day. The mini-bike race could have 50 riders; the Saturday race could have 400 riders and the Sunday race could have 300 riders. Each big bike race begins about 9 a.m. and ends before 2 p.m. The amount of fugitive dust generated could be dependant upon soil and air conditions for the day.

Monitoring of race events in the past has revealed that the dust situation can be low to moderate on the race route depending on soil type along the route segment, existing soil moisture, daytime air temperature, relative humidity and wind. On a dry day: the dust is visible in the vicinity of the most of the race route. Riders generally extend the distance between each other in the dusty areas and make up time in the rocky and firm-packed soil areas. Where the route is wide or where riders are pressured to compete for position on an up-hill, more dust is temporarily generated. Visibility for the riders may be slightly to totally obscured. On a low dust day: the dust is a small plume following each rider. The length and depth of that plume depends upon soil moisture and soil type in the exact pathway. An optimum riding day would include damp soil and moderate relative humidity along with moderate daytime temperature.

Monitoring has also revealed that dust from the motorcycle racing does not lie in the Virginia City area, nor is there enough volume to be transported to residential areas down wind. Dust is short term and is usually carried only a short distance from the source. This may be attributed to the narrow width of physical route disturbance form the cycle tires and due to the adjacent vegetation and topography. Breezes dissipate dust before it may affect populated areas.

Homes and businesses directly adjacent to the race route on paved or dirt streets and roads may experience some dust and noise from the event. The event is managed to reduce racer speeds within the City limits and near occupied residences to mitigate this impact. Slower speeds help reduce dust.

IV. b. Cultural Resources * (Segment is in Draft Status as of 4-21-2003)

In1993 the BLM conducted its first cultural resource survey of the motorcycle race route, even though the race has been conducted since 1971 (CR3-1555). The first race to be conducted under BLM's Special Recreation Permit authorization occurred in 1988.

The entire race route was inspected in 1993. The route encompasses paved road surfaces, well-established roads/trails (entailing complete surface disturbance over the entire road width), bladed roads and firebreaks, and single-track motorcycle trails. Some segments of the route underwent a field reconnaissance to assess whether or not portions of the race route were to be surveyed utilizing Class III standards. A cultural resources inventory was conducted on single-track motorcycle trails, an historic road, and two firebreaks, one in the Yellow Jacket Ravine and the other near Emma Ravine. All other portions of the racecourse were substantial bladed roads or roads and trails characterized by complete surface disturbance over the bed.

Based on the results of the 1993 field methods, surface disturbance associated with regular use (permitted and casual use) of existing roads and trails has occurred throughout the past. Since surface disturbance already existed on much of the race route, the "area of potential effect" (APE) was limited to more than 15 feet. Cultural resources were only recorded if the potential existed that the race activities would affect them.

Based on the parameters noted above, the following cultural resources were identified in 1993.

> For the most part, single track motorcycle trials yield only occasional isolated pieces of historic or modern trash and that trash was usually outside the APE for the race. One historic foundation was noted down-slope of a single track at the north end of Emma Ravine.
>
> One historic trash scatter was noted in Yellow Jacket Ravine. The trash scatter consisted of bone, shell, hole-in-the-top cans, bottle fragments, white ironstone shards, etc. The historic road is . . . associated with the Sutro Tunnel. The remains of a telegraph line and evidences of historic mining activity are situated upslope of the road. At least five historic foundations and associated trash are located on both sides of the road. Air shafts for the Sutro Tunnel and several other historic features were also observed.

Sites to be recorded for the 1993 race include the trash scatter (CrNV-3-4596), the Sutro Road (-3-5703), and the foundations situated along the Sutro Road (3-5702). In 2002 during the recordation of the aforementioned cultural resources, it was decided to record three of four Sutro Tunnel airshafts (3-5704) that are adjacent to the racecourse.

Based on field observations during post-use monitoring, surface impacts associated with the motorcycle races have not impacted significant cultural resources since 1988. Motorcycle tracks deviation from the racecourse has not occurred and foundations and historic refuse have remained undisturbed. Even though racing has occurred on the Sutro Road, the road bed itself has been severely altered from natural forces, thus motorcycle impacts will affect the integrity of the Sutro Road. Likewise, the motorcycle racecourse course does bisect mining related features, however, the use of the course is not extending past the modern travel way. Therefore, the mining-related features are not being impacted nor are the buildings in the urban corridor that are adjacent to the racecourse.

From 1971 to 1992 but with one exception, the race has occurred on the east side of Highway 342 the main roadway bisecting the Comstock area, including Virginia City. This holds true for the 2003 race, whereby, the racecourse will only be on the east side. Likewise, the 2003 race will only occur on existing roads and trails used previously during past races. Potential short-term and cumulative impacts along with race stipulations are discussed later.

Due to the very nature of the Virginia City NHL, sparse to dense mining-related sites along with domestic sites are scattered throughout the Landmark. Artifacts and features are present along most the race courses while existing roads and trails have bisected others. In some instances, the racecourse itself utilizes historic roads. Because of the cultural resource significance and density of the resources, monitoring has proved effective to ensure that cultural resources have not been impacted because of the race. Monitoring will continue to occur and likewise additional documentation of the Landmark's cultural resources will continue.

Even though not all the cultural resources have been recorded in the general area of the racecourse, the 2003 race will have no significant impacts to the cultural resources of the Virginia City NHL. This assessment is due the fact that the race occurs on existing roads and trails, no impacts occur to historic roads, and monitoring has provided extensive documentation that cultural resources have not been impacted since 1988.

IV.c. Hazardous Materials *

A field inspection of the route that travels through Seven and Sixmile Canyons revealed that several historic mill sites were near portions of the racecourse. The soils at these mill sites varied in texture from packed rock to fine sand and silt. Some of the soils at the mill sites depicted white, gray and or yellowish colors. Soils within the routes near the mill sites were less colorful and more dirt-like than those directly at the mill sites and tailings piles associated with the mills.

EPA reports that evaluated the potential risk of exposure to mercury contaminated soils were mostly associated with excessive off-road motorized play directly on the tailing piles. This activity had been occurring near Dayton. This activity is not tolerated near Virginia City since the tailings, waste rock piles and mill sites are part of the Landmark and landscape protection.

Two of the 6 mill sites near the racecourse in Sevenmile Canyon are possibly located on public land. The other mill sites reside on private land. Private land owners have been notified of the race by the event coordinator. Owners have given their approval for race use.

According to the following report, Carson River Mercury Site Report regarding EPA ID# NVD980813646 May 2002, the residual mercury is primarily held in the sediments and adjacent floodplain of the Carson River. The primary health risk is to children in long-term direct contact with highly contaminated soils, which can be found in tailing piles or at former mill sites, and to individuals who consume contaminated fish or wildlife. Per that report, investigations are expected to continue through 2003. The focus is on the river, reservoir, and wetlands of the Carson River and Lahontan Reservoir. As of May 2002, the Carson River Mercury Site is the only site in Nevada listed on the Superfund National Priorities List.

Soil sample reports taken in the Seven and Sixmile Canyons during the EPA CRMS Study reflect variable mercury levels within the tailings sites.
According to the Technical Note 390, Risk Management Criteria for Metals at BLM Mining Sites (1996), ATV riders (and motorcyclists by association) may be affected by mercury-contaminated soils by ingestion or inhalation of surface soils. The ATV rider would have to be exposed to 550 mg/kg (milligrams per kilogram) mercury to assume a medium risk of contamination assuming 14 days of exposure.

Considering that there may be approximately one mile of race route on BLM lands that crosses potentially contaminated mill site soils, the estimated exposure for one racer could be less than thirty minutes. Added to the private land potential, exposure is increased to approximately one hour per racer assuming each racer rides three-five laps during one race.

Potentially dusty soils represent less than 10% of the entire racecourse. Some exposure to fugitive dust cannot be avoided as riders stop, accelerate, corner and follow each other along the course. Racers could be exposed to micro-particles of mercury if it were suspended in the dust as they travel over a

segment of the race route near a tailing pile. Racers should be wearing face and skin protection in the form of helmets, goggles, masks or bandanas over their mouths, long sleeved shirts, heavy pants and boots, and gloves. Check Points are usually located away from dusty areas because these personnel are required to view each rider's number and record timings.

Riders should be advised of the exposure potential. Recommendations to reduce exposure to mercury-contaminated dust would include wearing a dusk mask or bandana if conditions are dusty, and washing the vehicle, body and clothing soon after the race. Hands and face should be washed before eating, drinking, smoking or handling children. Pregnant women should avoid exposure and not participate.

Most of the soil sample areas identified as mill site boundaries have been skirted by the racecourse routes in order to minimize soil disturbance and to reduce exposure to contaminated soils..

IV.d.Invasive and non-native species (weeds) *

Usually, surface disturbance associated with an OHV event area could allow for infestation by Scotch thistle or spread of Tall whitetop. However, this event would be conducted at the early part of the plant-growing season. Plants would not be in a seed state there-by reducing the opportunity to propagate a species.

Race participants usually clean and maintain their vehicles before and after each event to ensure best mechanical performance. Most competitors take overall pride in vehicle appearance and maintenance. There is the possibility that vehicles may distribute an errant seed from a non-local area, but the chances are slim.

Storey County, in co-operation with the BLM is engaged in an active weed abatement program. Chemicals are sprayed onto the plants seasonally. This spraying occurs in the later part of the growing season. Weed abatement chemicals would not affect participants.

IV.e. Threatened or Endangered Animal Species *

Although the amount of wildlife habitat lost would be negligible birds and mammals in the area could be displaced or avoid the area during the event period. They would be expected to return to the immediate area soon after the event.

IV.f. Threatened or Endangered Plant Species *

Places where the Candidate species buckwheat occurs have been avoided by using existing trails around the areas. Trail widths are reduced to avoid additional disturbances. Photographs have been taken at certain points along route segments to monitor actual disturbance. There has been no change noted although it is reasonable to assume that some plants may be contacted or uprooted if within the travel path of a vehicles tires.

IV.g. Wetlands/Riparian Areas *

There is usually a moderate amount of water running down the side of Six mile Canyon Road. This water comes from the Virginia City sewage treatment and is secondary, tertiary treated water. It is clean and poses no hazard to human health or safety.

The Emma and Yellow Jacket Ravines contain willow and wild rose bushes. They provide cover and some drinking water for wildlife. These ravines have intermittent water draining through them. The

water quantity is dependant upon weather events and snowmelt. They are occasionally scoured from seasonal thunderstorms events.

The race routes in these areas are occasionally in the bottom of the ravines, but are mostly adjacent to the ravine on the established trails. It is not feasible to travel in the bottoms of the ravines due to the occasionally thick brush.

Over the years, the race has had little or no affect on the vegetation or amount of water in the ravines.

IV.h. Human Health and Safety

Most abandoned mines and mining related equipment have been adequately fenced to prevent or reduce human intrusion. Where the race route passes near a potential hazard, the area is clearly marked with brightly colored banners and/or painted plates commonly used to advise racers of a hazard on the racecourse.

The BLM implements a Temporary Public Land Closure to provide for public safety and to protect adjacent resources. This closure, in conjunction with signs and route monitoring personnel, helps to prevent the general public from utilizing the race route or public lands during the event

The permitted Club provides organization and event management in conjunction with the cooperation of the local law enforcement, fire and medical personnel. Checkpoints would occur within previously disturbed areas associated with road junctions. These check points ensure rider compliance with the flagged route and rider safety. Past events have been successful and safe for competitors and spectators. One to five riders may be injured from falling off the motorcycle onto the rough terrain, or a collision with rocks or trees. Injured riders are attended to by EMT's who are riding the race course on motorcycles. The EMT's have direct contact with other trained medical personnel. There have been no known collisions between participants, spectators or livestock.

April/ May event dates are usually prior to the occurrence of wildland fire conditions. The fire danger rating is usually Low at this time of year. Should drought conditions prevail, dry grass and brush may provide fuel should an ignition occur. To date there has been only one fire on the race course. A motorcycle caught fire on a remote section of the route. It burned until the gasoline was gone (approximately 2 gallons). The cycle was in the middle of the route and no vegetation was consumed.

All vehicles are required to have functioning mufflers and spark arresters. The race club personnel check for this during the pre-race technical inspection.

To further protect wildland resources, the BLM implements a Temporary Public Land Closure. This restricts all but event traffic to the race area. No camping or spectator areas are encouraged outside of Virginia City proper.

IV.i. Lands and Realty

Sixmile and Sevenmile Canyon Roads would be closed during the race, but would be available for use before and after each race.

The overhead utility poles, guy wires, or other improvements associated with the utility line may represent a hazard to the racer. If these obstacles are within 10 feet of the race course, they are flagged

and barricaded to reduce the opportunity for collision. Depending on the situation, a rider could be injured if a collision occurred.

Private property owners are notified by the event permittee well in advance of the event date. Most provide approval to the permit applicant for the conduct of the event. Public and private entities are listed as additional insured on the commercial, public liability policy held by event permittee.

IV.j. Range (Livestock Grazing)

Domestic sheep grazing in the event area is usually completed by the middle of May. The grazing permittee is routinely notified of the pending race. When the event occurs prior to the end of the grazing period, the permittee makes every effort to have their flock of sheep beyond race influence.

No direct impact to productive grazing lands is anticipated since the route is already in existence. Some inconvenience may be imposed on the permittee depending on weather conditions and grazing patterns

IV.k. Minerals/Mining

Mining claims would not be affected by the proposed action. There are no active Plans of Operations for within the event area.

IV.l. Recreation

Most of the recreational human use associated with the event centers within Virginia City's business district. No other public land use is accommodated during the race periods.

Other recreational activities could be restricted. Visitors to the Landmark could be impacted by the Temporary Public Land Closure which is implemented by BLM to provide for public safety and resource protection. The Closure would be in effect both days of the event. Tourists using the truck route, Highway 341, could be slightly delayed as they are escorted through the crossing areas.
The opportunity for human collision exists, but has been controlled in the past through permit stipulations and extensive race management. The race sponsor provides monitors at obvious intrusion locations. This is done to protect the casual public and the racers. Sweep riders and EMT's ride the course throughout the duration of the event to manage on-course activity and to provide immediate support to injured riders.

There are no spectator areas provided on public lands. A Public Land Closure would be in place for the entire race area. Some spectators may be within 20 feet of racers, especially at the start and pit areas.

The sponsor is responsible for attaining permission to use existing roads and trails within the mine operation boundaries. No problems have occurred in the past.

IV.m. Socio-Economics

Motorized vehicle events may benefit the recreation/tourism industry (and in turn, the regional economy) by attracting participants, family, friends, support personnel, and spectators to the event area. The participants may purchase fuel, food, and other supplies from local merchants. They may also stay in local motels or hotels and eat at local restaurants. These activities serve to stimulate the local economy. The degree of stimulation depends on how many participants are attracted to the event and how much money they spend while in the event area and how often the events are held.

Providing more outdoors type recreation opportunities is one way the State of Nevada and small population base Counties are trying to diversify and improve the local economic situation.

The Virginia City Convention and Tourism Authority recently estimated that this race event could potentially generate about $256,000 in revenues to Virginia City. This estimate was based on the following possibilities: if the event attracted 2000 spectators and 400 entrants who each brought 2 support persons then approximately 3000 visitors could be attracted to the event. If each visitor spent $20 - $80 / day, the revenue generated could vary from $120,000 to $480,000 (average $300,000).

While the race itself (participants and spectators) likely contribute to the local economy (Storey County/Virginia City), it is the larger, regional economy that benefits from equipment sales, lodging, gambling, and other services

There are also event related costs that must be built into the profitability of the event. The event generally donates a portion of the proceeds back to the community for the purchase of school books or to support a needy family. Most of the race related personnel who help with the event are volunteers, motorcycle club members and local residents. Expenses include but are not limited to: property leases, insurance, environmental analysis fees and event use fees, law enforcement, medical and radio communication and supplies, rental of portable toilets, heavy equipment to move dirt at the start area, flagging, arrows, and hay bales to mark the race route and to manage the crowds, promotional material and awards. The cost of conducting a race event may be $20,000.

IV n. Soils/Trails

There are no steep, straight-line hill climbs proposed. Most roads and trails within this proposal contain turns following natural contours or the corners have been bladed in for mining access. Most portions of the route are favorable to either mechanical or handtool rehabilitation as long as the work occurs immediately following the event and prior to an extended rainfall. Most of the soil conditions along the route are stable. It is very rocky with a shallow overlay of loamy fill.

When wet, some of the loamy areas become sticky or they pack into a slick rut (also fondly known as a "blue groove" which forms when rubber tires follow the same track). The groove is usually a single line about 1 foot wide. It usually follows the best traction line along the trail alignment. These grooves may be 50 yards to ½ mile in length between other soil types. Water could run down the groove if a thunderstorm occurs immediately after the race. Past observations have not validated this occurrence at Virginia City. Usually the post event weather is a snow storm or a spring rainfall which actually helps loosen and redistribute the grooved soils.

Fugitive dust and displaced soil could occur over the sandier portions of the route. The extent of this would be dependant on soil dryness. Since the event takes place in April/May, the soil is likely to be somewhat damp below the ground surface. If extremely dry conditions exist on race day, the opportunity for trail widening could increase due to the possibility that riders would spread out in search of better visibility behind each other.

Extremely wet conditions could generate moderate to deep ruts and occasional widening to avoid deeply trenched sections or standing puddles. Snow could create a higher safety risk due to coverage of hazards and slippery conditions. Extreme conditions may postpone or cancel the event.

Trail use impacts depend on popular use and seasonal weather events. During the history of the race, most trails had not been used during consecutive years. Within the past ten years, it has been necessary to re-use route segments due to the increase in developed private lands north of the Landmark. Race routes have been varied in combination of terrain and direction of use patterns. No destruction of historic structures or features seems to be directly related to the running of this event. The non-motorized character of some of the historic routes has been changed not only by the occurrence of the event, but also by the progress of motor vehicle use in general.

Event participants would be restricted to currently exposed and well-established road and trail areas. The allowable 50' trail limit stated in the MRANN rulebook would be reduced for this race to existing widths, which currently vary from 1' - 12' on established dirt trails and roads.

Monitoring over the past ten years has revealed that the race route combinations have stabilized, although there is always the desire to add variety to the existing pattern. Some routes have been temporarily removed from the pattern due to private ownership transitions and resource inventory. This has increased the pressure on the existing route system. Longer race routes reduce temporary and long term affects to the tread path and adjacent trail edge resources by reducing the number of laps a rider completes. The longer race routes also tend to spread riders out to greater distances between themselves which aide passing within the appropriate disturbed areas.

BLM stipulations, emphasis on monitoring and minimum resource impacts, and racer / event compliance with those stipulations has contributed to the stabilization of route location and minimum width expansion. Occasional course cutting does occur, but the event and BLM personnel quickly disqualify riders caught cutting. Cut corners are immediately bannered to prevent continued use during the races and are rehabilitated after the event. Course cutting has been greatly reduced over the past five years. Improved route maintenance has contributed to the tread life of the trail and reducing the desire for travelers to get off the trail in search of better conditions.

Important factors to maintaining the existing trail resource stability include ensuring that the routes are varied and that attention is paid to the direction of travel in certain areas. Areas of clay-like and soft soils should only be run downhill. The exception would be if the alternatives were pre-planned based on daily weather affects. Another detail is ensuring that the course lay-out allows racers to spread out enough along the course during the first thirty 15 – minutes of the race. It is important to avoid creating bottle-necks where racers converge suddenly into one area of technical difficulty. Such attention to course lay-out and post event maintenance helps protect adjacent resources as well as sustaining the tread life of the roads and trails.

Mitigation standards written into the permit stipulations would neutralize most race impacts and effects within 60 days after the event. These standards are reviewed by the sponsor and agreed to prior to permit authorization.

A BLM employee familiar with the restrictions in special areas would supervise any repairs needed in potentially sensitive areas.

IV.o. Vegetation

Peripheral vegetation may be crushed by vehicle travel. However, existing vegetation within the roadbed or the adjacent shoulder is sparse so overall impacts would be minimal.

All portions of the proposed route are within previously disturbed trail ways. Vegetation would be impacted if a rider chose to pass another rider along the trail edges. Mitigation standards in the permit stipulations require that riders pass only within existing disturbed trail areas.

IV. p. Visual Resources Management

The proposed races would not affect the area's current VRM Class III or IV ratings. No new trails or construction is currently proposed. No change in the scenic character is currently expected. The entire Landmark and Historic District is crisscrossed with mining exploration and support roads and trails, both historic and modern. The use of some of these existing roadways in accordance with the permit stipulations would have little or no impact on the visual resources levels existing in the area.

IV.q. Wildlife

It is expected that local wildlife individually may be temporarily displaced from their locale. Numbers of large animals are few and the proposed race would only be temporary, lasting less than five hours. Small animals could be run over or their burrows temporarily affected by someone driving on them.

Impacts resulting from the proposed action would be temporary displacement of animals due to noise and constant vehicular traffic. Some animals may be bearing or rearing young at this time of year (early May). Impacts would depend on the proximity of the route to bedding areas. Most large animals will have been alerted prior to the event due to club members marking and checking the route.

Nesting birds may be affected if their nests are within 30' (an unsubstantiated distance estimate) of the race route. The eggs or fledglings could be abandoned or killed. No new route is proposed, therefore no vegetative cover or habitat would be lost to other ground nesting species.

Impacts to wildlife associated with the 1 mile of wash habitat are recognized, but difficult to quantify. Displacement of animals and some destruction of microhabitat may occur.

No Action Alternative - Environmental Impacts

Under selection of the **No Action** alternative, none of the above-described impacts would occur.

The applicant would not be granted a Special Recreation Permit to conduct a motorcycle race. Competitors would not have a race to attend. Virginia City would be required to find alternative methods of tourism attraction events.

Mitigation Measures (as applicable)

There would be no motorcycle riding on any tailing pile as a part of the permitted event. Portions of the race route could utilize existing waste-rock piles where existing travel routes have been previously established.

Nevada Division of Environmental Protection, Air Pollution Control may monitor the OHV event to observe the production of *pm10* fugitive dust.

Soil that has been displaced along the trails as a direct result of racing, shall be returned to the trail paths and areas smoothed to natural contour after the event per post use rehabilitation requirements. Water control methods would be utilized to reduce the potential for post-event run-off erosion.

Residual Impacts
There would be no residual, irretrievable or irreversible commitments of resources resulting from the issuance of the permit.

The roads and trails are well established. Spot maintenance has proven to be effective following race events that have occurred in the past.

Cumulative Impacts
The cumulative effects of this event include the past, annual occurrence of the activity for more than thirty years. Some portions of the roads and trails used for racing have become wider as a result of the event and due to the additional use by wider vehicles after an event. Most widening has stabilized and has not increased noticeably over the past five years. An example of widening might be an increase from a 2' wide path to up to 6' wide. This has occurred where soils are soft and trees and other vegetation are less dense creating an obvious temptation to driver's of wider vehicles to attempt trail passage. Approximately 3 - 5 miles of the total thirty plus available route mileage has been widened. In general, the overall terrain is very rocky and not conducive to trail expansion.

BLM stipulations, emphasis on monitoring and minimum resource impacts, and racer / event co-operation and compliance with those stipulations has contributed to the stabilization of route location and minimum width expansion. Occasional course cutting does occur. Event and BLM personnel may disqualify riders caught cutting. When cutting or short coursing is observed during a race, additional flagging and banners are added to reduce impacts. Affected areas are naturalized following the race. Course cutting has been to be lessening over the past five – ten years. This is likely due to increased OHV riders' awareness of proper land use ethics and concern about losing riding areas on public and private lands. Improved route maintenance has contributed to the tread life of the trail and to reducing the desire for travelers to get off the trail in search of better trail conditions.

Participation in the event varies from year to year. The number of riders has varied from 300 to 900 total riders. This variable is likely to continue. It is dependant on the rider's appreciation and success of the race management, course challenge, rider enjoyment, and weather factors during an event.

The annual impacts of each race are expected to be temporary. The predominant portion of the proposed course would be on roads, washes and well established trails that have been utilized by the annual motorcycle races since 1970.

There is the possibility that visitors associated with the proposed race may return to the area and ride their along portions of the course. This could bring an increase in use. Past monitoring and seasonal observations have revealed few riders in the area at other tie s of the year. It seems that the rocky terrain deters most motorcyclists from returning to the racecourse, once a year is usually enough for this type of riding. ATV and Jeep are the preferred vehicle for this country.

Once an event is permitted, a site is generally considered "cleared". This is interpreted as meaning similar events may again be permitted in or at the same area. It is likely that one to three events of similar size and nature may conceivably be permitted at this site annually over the next five years. Monitoring of each event conduct and effects would continue. Should impacts as a direct result of the events become detrimental to the landscape, cultural or natural features, the events may be discontinued at the discretion of the Authorizing Officer.

Casual use is likely to fluctuate with the economy and changing interests. When the economy is strong, enthusiasts are more likely to spend extra cash on recreational vehicle upgrades and modifications to enhance vehicle appearances and performance. When the economy is slow, participation in less costly recreational pursuits is likely.

Each year more individuals are purchasing off highway vehicles (OHVs) and coming to areas managed by the BLM to ride or drive OHV's. BLM lands are beginning to become known for OHV use, which includes: ATVs, dirt bikes, dune buggies and four wheel drive vehicles.

With or without the proposed race, more people will be coming to the area to participate in outdoor recreation activities. It is important to maintain open roads and trails in order to direct use onto sustainable routes. Use of the popular routes helps protect natural and cultural resources scattered about on the less popular routes and areas

Throughout this environmental assessment, resource values have been evaluated for cumulative impacts. It has been determined that cumulative impacts would be negligible as a result of the proposed action or alternatives.

Monitoring

Resources to be monitored include: number, location and conduct of spectators, number and conduct of participants (willingness to comply with land use stipulations), community support and reception, racecourse locations and mapping, road and trail widening, course cutting, mill site intrusion, wildlife behavior and occurrence, vegetation affects and resilience, dust generation, post event maintenance success, and affects to cultural resources (artifacts and features), public land stewardship by the proponent and the community to develop and perpetuate sustained multiple use. Monitoring has included photo documentation, mapping and personal observations.

Carson City Field Office SRP Policy, January 2003, directs that all OHV events be monitored. The objective of the monitoring is to ensure that the events are properly and safely conducted according to event specific rules and regulations and according to BLM permits stipulations.

Predicted and un-predicted impacts to natural and cultural resources are to be evaluated before, during and after each event. Monitoring observations could be used to develop a recreation management plan for the area.

Any Field Office Specialist may monitor an event. Generally the monitor would be an Outdoor Recreation Planner, Recreation Specialist or Volunteer observer familiar with events and BLM requirements

V. CONSULTATION & COORDINATION

A. List of Preparers/Reviewers:

NEPA coordination - Terri Knutson
Cultural Resources – Gary Bowyer
Hazardous Materials – Terry Neuman.
Lands – Ken Nelson
Minerals & Abandoned Mine Safety – Neal Brecheisen;
Range – Robert Mead
Recreation – Fran Hull
Socio-economics – Tom Crawford
Soils, Noxious Weeds, Vegetation – Jim DeLaureal
T&E Plants - Dean Kinerson
Water Resources & Riparian Habitat – Gabe Venegas
Wildlife & T&E Animals - Rick Brigham
Visual Resource Management - Terry Knight

B. Persons, Groups or Agencies Consulted:

Storey County Sheriff's Department
Virginia City Convention and Tourism Authority
Nevada Division of Wildlife
Nevada Division of Environmental Protection, Air Pollution Control
University of Nevada Reno, Bureau of Mining and Geology
National Service Center, BLM Toxicology
State Historic Preservation Office – Nevada
Comstock Historic District Representative
Motorcycle Racing Association of Northern Nevada
Virginia City Motorcycle Club

C. Local Government Notification

Storey County Board of Commissioners

VI. Appendices or Attachments

General vicinity Map
Topographic Map
Maps
Photographs
Race Event Stipulations

BLM Interdisciplinary Team Review

The following BLM Specialists have reviewed the Virginia City Grand Prix Motorcycle Race environmental assessment. All comments have been incorporated and the documentation is complete.

Frances M. Hull — Project Lead Fran Hull — Date → 04-17-2003

Gary Bowyer — Cultural Resource Gary Bowyer — Date 4/21/03

Dean Kinnarson — Threatened & Endangered Species; Plants Dean Kinnarson — Date 04 24 03

William R Brigham — Threatened & Endangered Species; Wildlife Rick Brigham — Date 21 April 2003

Terry Neuman — Hazardous Materials Terry Neuman — Date 4/24/03

Ken Nelson — Lands/Realty Ken Nelson — Date 4/21/03

Terry Knight — Recreation, Visual Resources Terry Knight — Date 4/22/03

Jim DeLaureal — Invasive Non-native Species; Soils Jim DeLaureal — Date 4/29/03

Robert R. Mead — Range Randy Mead — Date 04/24/03

Calbe Venegas — Riparian Calbe Venegas — Date 4/24/03

Tom Crawford — Socio-economics Tom Crawford — Date 4/24/03

Neal Brecheisen — Minerals Neal Brecheisen — Date 4-17-2003

T. Knutson — Environmental Coordinator Terri Knutson — Date 4/24/03

Terry Knight — Program Lead Terry Knight — Date 4/22/03